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VIA ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 23A
New York, New York 10007

**Re: *United States of America v. Menendez, et al.*,
Dkt. No. 23-cr-490-SHS**

Dear Judge Stein:

As Your Honor is aware, this firm represents defendant Wael Hana in the above-captioned matter. We write with the consent of both the Government and the Office of Pretrial Services to request a modification to Mr. Hana's conditions of pretrial release during the period of the trial of this matter. Specifically, we respectfully request that Mr. Hana's residence be expanded to include a hotel close to the courthouse for the duration of trial so that he can stay overnight to consult with counsel and assist with preparations for the following day's proceedings. As noted, we have conferred with the Government, as well as the Offices of Pretrial Services for both the Southern District of New York and the District of New Jersey, and all have consented to the request and to the enclosed form of order, which is provided for Your Honor's convenience.

We thank the Court for its time and kind consideration of this matter. Please do not hesitate to contact me if the Court requires any further information.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All counsel of record (via ECF)